

From: "Cade, Ruth A." <racade@marathonpetroleum.com>

Date: April 24, 2020 at 2:24:14 PM EDT

To: "Shermer, Steven (ENRD)" <SShermer2@ENRD.USDOJ.GOV>, "Loukeris.constantinos@epa.gov" <Loukeris.constantinos@epa.gov>

Cc: "Franz, Ben" <rbfranz@marathonpetroleum.com>

Subject: RE: [EXTERNAL] Galveston Bay and St. Paul Park refinery force majeure notices

Steve,

Good afternoon. I think we can address the concerns in a simple email, but I am copying Kosta as well here since I know he and I chatted about this very thing a couple of weeks ago.

In short, the generalization of the CD paragraphs probably wasn't the best way to effectively describe the request for discretion for the month of April. It's actually much narrower than what is listed in the table, which lists each subparagraph of the general Paragraph 18 BWON requirements, including carbon canisters. Our approach for reduction of 3rd party contractors for both St Paul Park & Galveston Bay has been:

- Reduce to minimum levels of LDAR support staff
- Replace Method 21 LDAR quarterly monitoring with FLIR OGI techniques to identify leakers
- Maintain BWON carbon canister breakthrough monitoring as required
- Maintain sampling of EOL data points as required

Specifically, for Galveston Bay the specific discretion request is for:

- Quarterly Method 21 NDE measurements on closed vent system piping to a control device, including the hard piping to the carbon canisters, covers on the API & DAF, and portable waste management units like vacuum trucks. We are using FLIR to detect leaks on this equipment rather than Method 21.
- A short term missed monitoring event on 1 set of carbon canisters located on a frac tank associated with a tank cleaning event, where the waste contractor was performing the monitoring but demobilized quickly. The missed monitoring was for 1 week, and the smaller LDAR crew was mobilized to monitor as soon as it was discovered.

Specifically, for St Paul Park the specific discretion request is for:

- Quarterly Method 21 NDE measurements on closed vent system piping to a control device, including the hard piping to the carbon canisters, covers on the API & DGF, and portable waste management units like vacuum trucks. We are using FLIR to detect leaks on this equipment rather than Method 21.

Hopefully this answers your question with enough clarity, but if not, I'm happy to schedule the call for next week with the attendees you've noted.

Ruth

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